

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

MICHAEL STOCH, )  
                        )  
                        )  
Plaintiff,         )  
                        )  
                        )  
v.                     )      Case No. 22-cv-04231  
                        )  
                        )  
CITY OF CHICAGO, CHICAGO     )      Judge Steven C. Seeger  
POLICE OFFICERS D. SANCHEZ, )  
#18112, JAMES FRANCIS, #19345, )  
CHIEF JOSE TIRADO, #243,     )  
DETECTIVE SEAN INSLEY, #21369, )  
and JOHN DOES,             )  
Defendants.         )

**THE PARTIES' JOINT MOTION FOR ENTRY OF  
AGREED CONFIDENTIALITY PROTECTIVE ORDER**

NOW COME Defendants, DANIEL SANCHEZ, JAMES FRANCIS, JOSE TIRADO, SEAN INSLEY, and CITY OF CHICAGO, by and through their attorneys, BORKAN & SCAHILL, LTD, and Plaintiff, MICHAEL STOCH, by and through his attorneys, PEOPLE'S LAW OFFICE, and for their Joint Motion for Entry of Agreed Confidentiality Protective Order, state as follows:

1. This case stems from one of the protests that occurred in the City of Chicago during the summer of 2020. The attorneys for both Plaintiff and Defendants also represent parties in *Wilger, et al. v. City of Chicago, et al.*, 20-cv-06851 and *Kasper v. Laurenzana, et al.*, 22-cv-03563 and have previously agreed upon the language in the proposed Confidentiality Protective Order.

2. The Parties seek to enter the same order previously entered in *Wilger* and *Kasper*. See 20-cv-06851, Dkt. 97-3 (for a redline version), Dkt. 102; 22-cv-03563, Dkt. 31.

3. The Parties' proposed changes to the model order are made in anticipation of the types of documents that may be sought in this case involving the Defendant Officers and Defendant City of Chicago's employees.

4. The Parties' will submit the proposed order to the Court's email pursuant to this Court's Standing Order.

WHEREFORE, for the foregoing reasons, the Parties respectfully request this Court to enter the agreed upon protective order and for any other such relief which this Court deems proper.

Respectfully submitted,

/s/ Christiane E. Murray

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